

HENRY R. KAUFMAN, P.C.
ATTORNEYS AT LAW
60 EAST 42ND STREET
47TH FLOOR
NEW YORK, NEW YORK 10165

OFFICE: (212) 880-0842
MOBILE: (914) 589-7963
FAX: (212) 682-1965
HKAUFMAN@HRKAUFMAN.COM
WWW.HRKAUFMAN.COM

October 22, 2020

Hon. Carol B. Amon
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Monica Morrison v. Robert Langrick*: 1:18-cv-06127 (CBA) (RML)

Dear Judge Amon,

On behalf of plaintiff Monica Morrison, in reply to the submission of counterclaimant Robert Langrick, in his letter dated October 20, 2020, pursuant to Your Honor's Individual Practice Rule 3(A), we write to highlight the dispositive point, which is that the parties are in agreement that the status of this matter is ripe for submission of our proposed summary judgment motion for dismissal of the three defamation counterclaims in their entirety, with prejudice, and of any cross-motion for partial summary judgment submitted on behalf of Mr. Langrick.

While this pre-motion conference correspondence is not the place to address each other's substantive arguments in depth, we do note that Mr. Langrick does appear to agree that it will be *his* burden to prove both material falsity and fault (as Ms. Morrison's initial letter explained). Our lack of response to Mr. Langrick's other contentions, and his articulation of the substantive relief he will be seeking by cross-motion, should not be construed as our agreement (or disagreement) with any or all of those contentions.

Again, the key point is that the parties concur in the request that this Court schedule a pre-motion conference so that a briefing schedule can be set on the motion and cross-motion for summary judgment.

Respectfully Submitted,

/s/

Henry R. Kaufman,
Attorney for Monica Morrison

Cc: All Counsel of Record via ECF